

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE

NIKKI BOLLINGER GRAE, Individually and)	Civil Action No. 3:16-cv-02267
on Behalf of All Others Similarly Situated,)	
Plaintiff,)	Honorable Aleta A. Trauger
vs.)	REVISED CASE
CORRECTIONS CORPORATION OF)	MANAGEMENT ORDER
AMERICA, et al.,)	
Defendants.)	
_____)	

Class Representative Amalgamated Bank, as Trustee for the LongView Collective Investment Fund (“Plaintiff”), and Defendants CoreCivic, Inc., formerly known as Corrections Corporation of America (“CoreCivic” or the “Company”), Damon T. Hininger, David M. Garfinkle, Todd J. Mullenger and Harley G. Lappin (collectively, “Defendants”) (together, the “Parties”), submit the following [Proposed] Revised Case Management Order.

WHEREAS, under the current case management order (ECF No. 238), the deadline to declare experts and produce expert reports is July 31, 2020;

WHEREAS, additional documents were recently produced by the Federal Bureau of Prisons, and the Parties have been working to complete certain depositions by July 31, 2020;

WHEREAS, the Parties agree that a short extension to the expert disclosure deadlines, and no other deadlines, will allow the Parties to efficiently complete their depositions and disclosures and will cause no prejudice; and

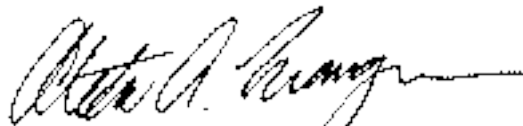
WHEREAS, the Parties reserve the right to seek additional modifications of the case schedule if such modifications become necessary;

NOW, THEREFORE, subject to approval of the Court, the Parties agree on the following deadlines to govern the remainder of the case:

Matter	Existing Date	New Date
The Parties Declare Experts and Produce Expert Reports Pursuant to Fed. R. Civ. P. 26(a)(2)	July 31, 2020	August 7, 2020
• Rebuttal	September 11, 2020	September 18, 2020
• Completion of Expert Depositions	October 2, 2020	<i>No change</i>
Dispositive & <i>Daubert</i> Motions		
• Opening Briefs	November 13, 2021	<i>No change</i>
• Oppositions	January 15, 2021	<i>No change</i>
• Replies	February 19, 2021	<i>No change</i>
Information Exchange	April 13, 2021	<i>No change</i>
Motions <i>in Limine</i>	April 16, 2021	<i>No change</i>
Motion <i>in Limine</i> Responses	April 27, 2021	<i>No change</i>
Pretrial Filings	April 27, 2021	<i>No change</i>

Matter	Existing Date	New Date
Pretrial Order	April 27, 2021	<i>No change</i>
Pretrial Conference	April 30, 2021	<i>No change</i>
Trial	May 18, 2021	<i>No change</i>

IT IS SO ORDERED.



THE HONORABLE ALETA A. TRAUGER
UNITED STATES DISTRICT JUDGE

Submitted by:

DATED: July 29, 2020

ROBBINS GELLER RUDMAN & DOWD LLP
CHRISTOPHER M. WOOD, #032977
CHRISTOPHER H. LYONS, #034853

s/ Christopher M. Wood
CHRISTOPHER M. WOOD

414 Union Street, Suite 900
Nashville, TN 37219
Telephone: 800/449-4900
615/252-3798 (fax)
cwood@rgrdlaw.com
clyons@rgrdlaw.com

ROBBINS GELLER RUDMAN & DOWD LLP
DENNIS J. HERMAN
WILLOW E. RADCLIFFE
KENNETH J. BLACK
Post Montgomery Center
One Montgomery Street, Suite 1800
San Francisco, CA 94104
Telephone: 415/288-4545
415/288-4534 (fax)
dennish@rgrdlaw.com
willowr@rgrdlaw.com
kennyb@rgrdlaw.com

ROBBINS GELLER RUDMAN & DOWD LLP
JASON A. FORGE
655 West Broadway, Suite 1900
San Diego, CA 92101
Telephone: 619/231-1058
619/231-7423 (fax)
jforge@rgrdlaw.com

Lead Counsel for Lead Plaintiff and Class
Representative

BARRETT JOHNSTON MARTIN
& GARRISON, LLC
JERRY E. MARTIN, #20193
Bank of America Plaza
414 Union Street, Suite 900
Nashville, TN 37219
Telephone: 615/244-2202
615/252-3798 (fax)

Local Counsel

RILEY WARNOCK & JACOBSON, PLC
STEVEN A. RILEY, #6258
MILTON S. McGEE, III, #024150

s/ Milton S. McGee, III
MILTON S. McGEE, III

1906 West End Avenue
Nashville, TN 37203
Telephone: 615/320-3700
615/320-3737 (fax)

LATHAM & WATKINS LLP
DAVID J. SCHINDLER
BRIAN T. GLENNON
355 South Grand Avenue
Los Angeles, CA 90071
Telephone: 213/485-1234
213/891-8763 (fax)

LATHAM & WATKINS LLP
ANNA E. BERCES
MORGAN E. WHITWORTH
505 Montgomery Street, Suite 2000
San Francisco, CA 94111
Telephone: 415/391-0600
415/395-8095 (fax)

Attorneys for Defendants Corrections Corporation
of America, Damon T. Hininger, David M.
Garfinkle, Todd J. Mullenger and Harley G.
Lappin